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SENT VIA HAND DELIVERY

May 5, 2008

Ms. Jean Jewell
Commission Secretary
Idaho Public Utilities Commission
472 W. Washington St.
Boise, ID 83702

Re: Case No. AVU-E-07-09 (AVISTA application for remote metering).

Dear Ms. Jewell:

Enclosed, you will find an original and seven (7) copies of the Community Action Partnership Association of Idaho's comments in response to AVISTA's Revised Application to Implement a Pilot Program for Remote Disconnects and Reconnects filed with this Commission on April 28, 2008. I hereby certify that I have delivered an electronic copy of the enclosed response to AARP and AVISTA as if today's date.

Please do not hesitate to contact me should you have any questions or concerns.

Very truly yours,


Brad M. Purdy

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May 5, 2008

Idaho Public Utilities Commission
472 W. Washington St.
Boise, ID 83702

Re: Case No. AVU-E-07-09 (Community Action Partnership Association comments on Revised Application "CAPAI").

CAPAI hereby responds to the Revised Application to Implement a Pilot Program for Remote Metering Disconnects and Reconnects filed with this Commission on April 28, 2008. As the Application and supporting Testimony of Linda Gervais indicates, the Revision to the Company's original Application filed on 8/31/07 was revised due to written comments filed by the Commission Staff, CAPAI and AARP and following two telephone conferences with the Company and a formal workshop conducted on March 27, 2008. In addition, there were numerous discussions that took place between Staff, CAPAI and AARP as the three parties arrived at their respective conclusions regarding the application.

On October 27, 2007, CAPAI submitted written comments opposing the Application and requesting either a formal hearing or a public workshop for the purpose of addressing concerns regarding the effect that AVISTA's proposal might have on its customers. Though Staff did not propose any form of hearings, it did propose changes to the Pilot Program. AARP also expressed its own concerns regarding the negative consequences that the Pilot Program might have on customers.

As a result of CAPAI's proposal for public workshops, the Commission issued a Notice of Public Workshops on January 27, 2008. Though the Commission originally scheduled two separate workshops, it was ultimately agreed that the most efficient and effective means of addressing the issues raised by the Application was through informal negotiations followed by a formal workshop conducted on March 27, 2008 and attended by representative of AVISTA, Staff, CAPAI and AARP. Informal discussions took place between the parties following the public workshop and the Company ultimately filed the Revised Application to which these comments reply.

In summary, CAPAI expressed the following concerns:

1. The Application, as originally proposed, singled out rural residents for the program. AVISTA originally listed being located in remote areas as a reason to place a customer on the program and has since removed that in lieu of issues related strictly to safety.
2. AVISTA also listed two levels of standards to be placed on the program whereby rural customers only were entitled to two disconnections in a three

year period before being placed on the program where as urban customers required three. CAPAI objected to this differing standard and the length of time as excessive. Avista agreed to set the same standard for both types of residential customers and to reduce the time frame from 3 years to one for purposes of the pilot.

3. Avista agreed to not include their most vulnerable customers in the pilot – those involved in their CARES program.
4. CAPAI has a concern with the loss of service that disappears when a field representative does not make a home visit – namely the opportunity for a “welfare” check and the means to pay on site before shutoff. Since Avista recognized the savings of not having a field representative present, they agreed at CAPAI’S request, to reduce the disconnect/reconnect fees by 50%.
5. Avista worked with CAPAI to develop provide adequate notice of being placed upon the program and appropriate wording on the disconnect notice.
6. Finally Avista worked with CAPAI to provide appropriate and meaningful evaluation tools to determine the impact this program will have on low income (LIHEAP) customers.

In summary, CAPAI believes that AVISTA has adequately addressed its concerns and no longer opposes the Pilot Program. CAPAI commends the Company for its willingness to engage in constructive dialogue and to cooperate with those concerned about the interests of all AVISTA customers.



Brad M. Purdy
Attorney for Community Action Partnership
Association of Idaho